

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Vincent Wendowski	:	Chapter 13
	:	Case No. 22-11368-MDC
Debtor(s)	:	

RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY
FILED BY PENNYMAC LOAN SERVICES, LLC.

Debtor, Vincent Wendowski, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Pennymac Loan Services, LLC, National Association, hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted payments missed, Debtor asks for the chance to catch up.
7. Debtor opposes the same.
8. Admitted payments missed, Debtor asks for the chance to catch up.
9. Denied. Debtor asks for the chance to catch up.
10. No objection.
11. No response required.

WHEREFORE, Debtor, by and through the undersigned counsel, respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

/s/ Brad J. Sadek, Esq.

Dated: September 28, 2022

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1500 JFK Boulevard Suite #220
Philadelphia, PA 19102
(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West, Esq.
Standing Chapter 13 Trustee
Electronic Notice

Brian Craig Nicholas, Esq.
Attorney for Movant *Pennymac Loan Services, LLC*.
Electronic Notice to *bnicholas@kmlawgroup.com*

Dated: September 28, 2022

/s/Brad J. Sadek, Esq
Brad J. Sadek, Esq.
Attorney for Debtor